

1 PITE DUNCAN, LLP
2 EDDIE R. JIMENEZ (NV Bar #10376)
3 ACE VAN PATTEN (NV Bar #11731)
4 701 Bridger Avenue, Suite 670
5 Las Vegas, Nevada 89101
6 Telephone: (858) 750-7600
7 Facsimile: (619) 590-1385
E-mail: ecfnvb@piteduncan.com

MAILING ADDRESS:
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, California 92177-0933

8 Attorneys for GMAC MORTGAGE, LLC

10 **UNITED STATES BANKRUPTCY COURT**

11 **DISTRICT OF NEVADA**

12 In re

13 KEEN ELLSWORTH,

14 Debtor(s).

15 Bankruptcy Case No. BK-S-10-12736-BAM

16 Chapter 13

**GMAC MORTGAGE, LLC'S REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS**

17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED
18 PARTIES

19 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC
20 Mortgage, LLC hereby requests special notice of all events relevant to the above-referenced
21 bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced
22 bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule
23 2002, the commencement of any adversary proceedings, the filing of any requests for hearing,
24 objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters
25 which must be noticed to creditors, creditors committees and parties-in-interest and other notices as
26 required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
27 referenced bankruptcy court.

28 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master
Mailing List in this case, the following address be used:

1 ACE VAN PATTEN
 2 PITE DUNCAN, LLP
 3 4375 Jutland Drive, Suite 200
 4 P.O. Box 17933
 5 San Diego, CA 92177-0933

6 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,
 7 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
 8 waiver of the within party's:

9 a. Right to have any and all final orders in any and all non-core matters entered only
 10 after de novo review by a United States District Court Judge;

11 b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant
 12 proceeding by Fed. R. Bankr. P. 7004, notwithstanding Pite Duncan, LLP's participation in the
 13 instant proceeding. This Request for Special Notice shall not operate as a confession and/or
 14 concession of jurisdiction. Moreover, the within party does not authorize Pite Duncan, LLP, either
 15 expressly or impliedly through Pite Duncan, LLP's participation in the instant proceeding, to act as
 16 its agent for purposes of service under Fed. R. Bankr. P. 7004;

17 c. Right to trial by jury in any proceeding as to any and all matters so triable herein,
 18 whether or not the same be designated legal or private rights, or in any case, controversy or
 19 proceeding related hereto, notwithstanding the designation or not of such matters as "core
 20 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
 21 statute or the United States Constitution;

22 d. Right to have the reference of this matter withdrawn by the United States District
 23 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

24 e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to
 25 which this party is entitled under any agreements at law or in equity or under the United States
 26 Constitution.

27 Dated: March 12, 2010

/s/ Ace Van Patten

28 4375 Jutland Drive, Suite 200

P.O. Box 17933

San Diego, CA 92177-0933

(702) 413-9692

NV Bar #11731

Attorney for GMAC MORTGAGE, LLC

1 CERTIFICATE OF SERVICE

2 I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND
3 SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on March 12, 2010.

4 Service was accomplished by the method and to the following as indicated:

5 BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

6 Keen Ellsworth
5117 Missy Marie Lane
7 Las Vegas, NV 89130

8 George Haines
Haines & Krieger, L.L.C.
9 1020 Garces Ave.
Las Vegas, NV 89101

10 Kathleen A. Leavitt
11 201 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89101

13
14 I declare under penalty of perjury that the foregoing is true and correct and that this
15 declaration was executed on March 12, 2010, at San Diego, California.

16
17 /s/ Jennifer Branton
JENNIFER BRANTON

18
19
20
21
22
23
24
25
26
27
28